

EXHIBIT 2



U.S. Department of Justice

United States Attorney
District of Minnesota

600 United States Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Telephone: (612) 664-5600
Fax: (612) 664-5787

December 27, 2019

VIA USAfx

Shannon Elkins, Esq.
James Becker, Esq.
Office of the Federal Defender
Suite 107, Diana E. Murphy U.S. Courthouse
300 South 4th Street
Minneapolis MN 55415

Re: United States v. Michael Hari
Criminal No. 18-CR-150 (1) (DWF/HB)

Dear Ms. Elkins and Mr. Aligada:

Pursuant to our ongoing discovery obligations, the government is making further disclosures today via USAfx. You will receive an invitation to the folder titled "20191227 Hari Disclosures" shortly. Attached is a log of the Bates numbers of documents you are receiving via USAfx.

These disclosures generally contain various law enforcement reports with attachments, business records from Verizon, open source searches, jail correspondence, search warrants for the phone numbers 952-228-0006 and 952-607-1821, for Michael Hari's hair samples, and FBI Laboratory reports.

Please keep in mind there is some physical evidence in this case, which is available for you to inspect at any mutually convenient time. Please contact us to discuss logistics and schedule an appointment to review the physical evidence, again at your convenience.

We also have audio recordings from a number of jail calls. That audio is available for your review, or we can burn those audio files to a disc and provide the discs to you.

You may choose, if you wish, to listen to all the calls now, or to wait until the government designates some of these calls as potential trial exhibits, and then listen to the calls so designated.

Please do not hesitate to contact us if you have any questions.

Sincerely,

ERICA H. MacDONALD
United States Attorney

s/ John Docherty

BY: JULIE E. ALLYN
JOHN DOCHERTY
Assistant U.S. Attorneys

12/27/2019 U.S. v. Hari Discovery Log

00000493 to 00000494	00011719 to 00011723	00023230 to 00023231
00000543 to 00000543	00011850 to 00011852	00023234 to 00023238
00000717 to 00000718	00012084 to 00012084	00023248 to 00023249
00001493 to 00001493	00012102 to 00012102	00023251 to 00023252
00001524 to 00001524	00015191 to 00015199	00023296 to 00023338
00001631 to 00001633	00015201 to 00015215	00023341 to 00023341
00001782 to 00001793	00015218 to 00015227	00023354 to 00023356
00001835 to 00001836	00015240 to 00015243	00023396 to 00023412
00001838 to 00001838	00015291 to 00015297	00023421 to 00023528
00001841 to 00001842	00015487 to 00015490	00023531 to 00023534
00001844 to 00001846	00015505 to 00015508	00023539 to 00023559
00001951 to 00001952	00015612 to 00015612	00023562 to 00023562
00002095 to 00002097	00015668 to 00015669	00023564 to 00023564
00002333 to 00002336	00015743 to 00015744	00023569 to 00023569
00009792 to 00009805	00015746 to 00015747	00023571 to 00023572
00009831 to 00009832	00015856 to 00015859	00023578 to 00023578
00010202 to 00010248	00016107 to 00016109	00023581 to 00023587
00010438 to 00010438	00016178 to 00016202	00023589 to 00023589
00010440 to 00010448	00016381 to 00016385	00023616 to 00023881
00010548 to 00010556	00019564 to 00019570	00023885 to 00024158
00010604 to 00010607	00019656 to 00019656	00024162 to 00024217
00010673 to 00010680	00019659 to 00019667	00024220 to 00024233
00010684 to 00010684	00020363 to 00020363	00024253 to 00024264
00010718 to 00010722	00022611 to 00022618	00024266 to 00024272
00011256 to 00011261	00022626 to 00022640	00024288 to 00024313
00011275 to 00011278	00022670 to 00022738	00024321 to 00024321
00011283 to 00011305	00022756 to 00022757	00024337 to 00024355
00011321 to 00011321	00022764 to 00022764	00024385 to 00024418
00011566 to 00011566	00022776 to 00023021	00024426 to 00024431
00011570 to 00011571	00023035 to 00023036	00024450 to 00024466
00011573 to 00011579	00023041 to 00023147	
00011616 to 00011642	00023153 to 00023162	
00011669 to 00011681	00023179 to 00023180	
00011714 to 00011716	00023214 to 00023228	

Shannon Elkins

From: S [REDACTED] (USAMN) <[REDACTED].S [REDACTED]@usdoj.gov>
Sent: Wednesday, January 15, 2020 4:50 PM
To: Shannon Elkins; James Becker
Cc: Allyn, Julie (USAMN); Docherty, John (USAMN)
Subject: U.S. v. Hari, 18-cr-150 (DWF)

Good afternoon counsel,

The government is making further disclosures this afternoon via USAfx. You will receive an invitation to the folder titled 2020-01-15_Hari_Michael shortly. The disclosures bear the Bates numbers listed below. They consist of law enforcement reports and inmate mail from Joe Morris. Additionally, we are disclosing natively the return for Joe Morris' Facebook account.

Please do call with any questions.

Bates Numbers disclosed:

00011972 to 00011984
00015586 to 00015595
00022739 to 00022746
00022749 to 00022749
00023039 to 00023040
00023163 to 00023168
00023181 to 00023182
00023193 to 00023195
00023213 to 00023213
00023229 to 00023229
00023232 to 00023233
00023239 to 00023239
00023339 to 00023340
00023357 to 00023357
00023413 to 00023413
00023529 to 00023529
00023561 to 00023561
00023566 to 00023568
00023570 to 00023570
00023573 to 00023577
00023590 to 00023601
00023610 to 00023615
00024160 to 00024161
00024241 to 00024243
00024265 to 00024265
00024281 to 00024283
00024287 to 00024287
00024362 to 00024362
00024364 to 00024364
00024383 to 00024384
00024472 to 00024559

00024562 to 00024646
00024654 to 00024766
00024772 to 00024794
00024797 to 00024802
00024804 to 00024805
00024807 to 00024808
00024810 to 00024812

L [REDACTED] S [REDACTED] | Lead Paralegal Specialist
United States Attorney's Office | District of Minnesota
600 U.S. Courthouse | 300 South 4th Street
Minneapolis MN 55415
612-664-5654 | [\[REDACTED\]@usdoj.gov](mailto:[REDACTED]@usdoj.gov)

Shannon Elkins

From: M█████.Z█████@usdoj.gov on behalf of M█████.Z█████ <noreply@box.com>
Sent: Friday, January 17, 2020 2:41 PM
To: shannon_elkins.fd.org@esfs.us
Subject: M█████.Z█████ has invited you to work together in "20200117 Hari Disclosure" folder on Box



M█████.Z█████ wants to work with you on 20200117 Hari Disclosure



20200117 Hari Disclosure

"I'd like to share my files with you on Box."

[Go to Folder](#)

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This is an official notification from the USAfx File Exchange system.



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January 23, 2020

Shannon Elkins
James Becker
Assistant Federal Defenders
107 U.S. Courthouse
300 South Fourth Street
Minneapolis, Minnesota 55415

VIA EMAIL

Re: *United States v. Michael Hari*
Criminal No. 18-150 (DWF/HB)

Dear Ms. Elkins and Mr. Becker:

As referenced in our Expert Disclosure letter sent to you today, January 23, 2020, please find several discs, or physical copies, of the lab notes of forensic examiners from the FBI laboratory in Quantico, Virginia. These discs also include the standard qualitative procedures for each laboratory unit associated with the examiner.

Please feel free to contact us with any questions or concerns.

Very truly yours,

ERICA H. MacDONALD
United States Attorney

s/ Julie E. Allyn

BY: Julie E. Allyn
Assistant U.S. Attorney

John Docherty
Assistant U.S. Attorney

Shannon Elkins

From: S█████, L█████ (USAMN) <L█████.S█████@usdoj.gov>
Sent: Tuesday, January 28, 2020 4:50 PM
To: Shannon Elkins; James Becker
Cc: Allyn, Julie (USAMN); J█████ F█████ Docherty, John (USAMN); Ethen, Allison (USAMN); R█████ K█████; J█████ F█████
Subject: U.S. v. Michael Hari 15-cr-150 (DWF)

Good afternoon counsel,

Our expert disclosure letter of January 23, 2020 identified items from Dr. Jason Barrow, Jacqueline Slebrch, and Nicole Bagley which we were awaiting. We have received those items and they will be available to you via USAfx. You will receive an invitation to the folder titled "20200128 Expert Disclosure Slebrch Bagley Barrow" shortly.

L█████ S█████ | Lead Paralegal Specialist
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U.S. v. Michael Hari
18-cr-150 (DWF)
January 31, 2020 Discovery Index

Reports of interview, some of 404(b) items, some victim statements			
00010608	00015912	00026328	00026844
00011773	00019853	00026336	00026967
00011794	00019905	00026337	00026977
00011997	00019922	00026338	00026978
00015861	00026193	00026339	00026980
00015863	00026230	00026340	00026844
00015872	00026231	00026525	
00015873	00026256	00026541	
00015874	00026281	00026559	
00015882	00026291	00026563	
00015886	00026298	00026571	
00015889	00026324	00026613	
00015902	00026326	00026843	
Subpoena Returns			
00026543	00026921	00026961	00026967
00026544	00026922	00026962	00026968
00026545	00026936	00026963	00026969
00026548	00026937	00026964	00026970
00026549	00026938	00026965	
00026919	00026960	00026966	
Lab Reports			
00010249	00026575	00026609	00026840
00026305	00026576	00026829	
00026318	00026580	00026830	
00026553	00026605	00026833	
00026554	00026606	00026837	
00026555	00026608	00026839	
Jail Call Review			
00026178	00026487	00026487	
00026180	00026488	00026488	
00026182	00026824	00026824	
00026186	00026908		
00026189	00026910		
Photos from Bloomington PD			
00026425			